

MEMORANDUM ENDORSED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

 ORIGINAL

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MANCHANDA LAW OFFICES, PLLC a
New York professional limited liability
Company, and RAHUL MANCHANDA, an
individual,

CASE NO.:
07 CV 6708

Plaintiffs,

ECF CASE

vs.

XCENTRIC VENTURES, LLC, an Arizona
limited liability company d/b/a
RIPOFFREPORT.COM and d/b/a
RIPOFF REPORT and d/b/a/
BADBUSINESSBUREAU.COM,

JUDGE STANTON

and

Notice of Dismissal/
Motion to Withdraw
Complaint and
Amended Complaint

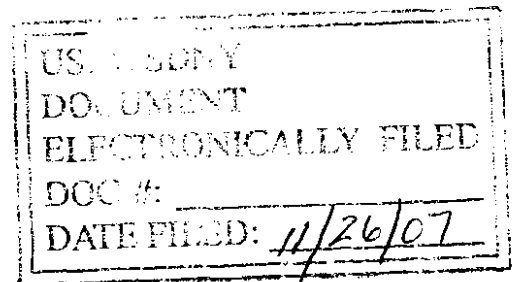
EDWARD MAGEDSON, aka "Ed Magedson,"
an individual,

and

NITIN RANA, an individual,

and John Does #1-4

Defendants.
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Plaintiffs MANCHANDA LAW OFFICES PLLC and RAHUL D. MANCHANDA, by and through counsel, hereby moves this Honorable Court pursuant to Rule 41 (a) (1) of the Federal Rules of Civil Procedure to dismiss the above captioned action pending before this Court **without prejudice**.

Plaintiffs filed a Complaint against Defendants Xcentric Ventures LLC d/b/a Ripoffreport.com on July 25, 2007. Plaintiffs filed an Amended Complaint in the above captioned action on October 10, 2007. Plaintiffs have not served either the Complaint or Amended Complaint on any of the above captioned named Defendants or John Does #1-4 to date. At this time, Plaintiffs wish to withdraw the Complaint and Amended Complaint.


Plaintiffs hereby request that the above captioned action be withdrawn **without prejudice** as Defendants have yet to be served.

Pursuant to Rule 41 (a) (1) of the Federal Rules of Civil Procedure, "unless otherwise stated in the notice of dismissal or stipulation, the dismissal is without prejudice, except that a notice of dismissal operates as an adjudication upon the merits when filed by a plaintiff who has once dismissed in any court of the United States or of any state an action based on or including the same claim." As Plaintiffs have not previously filed an action against any of the above captioned named Defendants and John Does #1-4, Plaintiffs request that this Notice of Dismissal be granted **without prejudice**. Furthermore, no Stipulation of Dismissal or Stipulation of Settlement is required because none of the above captioned named Defendants have been served.

WHEREFORE, Plaintiffs hereby request that their Motion to Withdraw be GRANTED and Case Number 07 CV 6708 be dismissed by this Court **without prejudice**.

Respectfully Submitted:

/S/


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*So ordered
Honis 2.
Stanton
11/26/07*